

July 2, 2005

Mr. Ron DeHaven
APHIS Administrator
USDA

Dear Mr. DeHaven:

As a representative of a large number of miniature pig owners in the United States, we would like to comment on the proposed National Animal Identification System (NAIS) by the USDA.

The miniature pigs in this country (mostly Vietnamese Potbellied pigs, Kune Kune pigs and other exotic breeds of miniatures) are not raised as food animals and will never enter the US food chain. They are bred, sold and kept primarily as pets and companion animals, much as one would a dog, cat or other more traditional companion animal. Most stay in their homes for their entire lives and receive regular veterinary care, vaccinations, veterinary check-ups, and daily care as would any companion animal. We fully recognize that miniature pigs are subject to and can transmit the same diseases as commercial swine.

The NAIS standards, as they are currently proposed, do **not** indicate whether pets normally classified as livestock, such as the miniature pigs, will be subject to the proposed NAIS requirements. If they were to be included, every individual in the US who owns a pig as a pet/companion animal would be required to have a premise identification number and their pet pig(s) would have to be marked and identified as required. This would require USDA and the states to supervise thousands more premises for a relatively small number of pigs who, realistically, pose no threat to the food chain in the first place. It would also create an enforcement problem as well as a huge education problem for USDA as many pet pig owners would simply not apply for a premise identification number and new pet pig owners would need to be educated on the requirement to do so.

If it is the intention of the USDA to include the thousands of "pet pigs" in the US in the NAIS, despite the fact that they will never enter or impact the food chain, we would like to request, at minimum, a temporary exemption for the miniature pigs from the provisions of the NAIS until such time as representatives from the pet pig community can meet with USDA officials and discuss what, if anything, can be done to meet the goals of the NAIS while, at the same time, minimizing the impact on the large numbers of miniature pigs kept as pets and their caretakers.

The International Potbellied Pig Registry (IPPR) and the North American Potbellied Pig Association (NAPPA) have created a registration and tracking plan for miniature pigs, which we feel may address many of the mutual concerns we share. A draft copy of this plan is attached. NAPPA is also currently developing bio security guidelines involving the transportation and housing of pet pigs of in private homes, sanctuaries and breeding

facilities. These guidelines will be ready for presentation to our joint membership and the pet pig community by the end of the summer. We are forming a small “working group” of professional individuals who represent a cross section of the miniature pig community, including pet pig owners, breeders and sanctuary directors who would like to be involved in any USDA discussions or planning sessions with regard to the miniature pigs and their treatment under the developing NAIS. We believe that by working together; we can offer the USDA a sound plan that complies with the spirit of the NAIS goals.

I am available to answer any additional questions you may have and we look forward to working closely with the USDA in the future.

Respectfully submitted,

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Board of Directors Member-International Potbelly Pig Registry
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